

EXHIBIT C

Designation Run Report

LH-618

Lamb, Hana 09-29-2020

Defense Designations 00:47:55

Total Time 00:47:55



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6:18 - 7:5	<p>Lamb, Hana 09-29-2020 (00:00:44)</p> <p>6:18 California. The date today is Tuesday, September 29th, 6:19 2020, and the time is approximately 7:32 a.m. Pacific 6:20 Standard Time and 8:32 a.m. Central Time where our 6:21 witness is. 6:22 MR. DUFFY: I think it's Mountain time, Philip. 6:23 Sorry. 6:24 THE VIDEOGRAPHER: It is Mountain Time. I 6:25 stuttered there. So 8:32 Mountain Time where our 7:1 witness is. 7:2 This deposition is taking place remotely via 7:3 Zoom in the matter of Pacific Fertility Center 7:4 litigation with case number 3:18-cv-01586-JSC. This is 7:5 the videotaped deposition of Hana Lamb.</p>	LH-618.0
8:3 - 8:7	<p>Lamb, Hana 09-29-2020 (00:00:06)</p> <p>8:3 just get a little understanding. Are you currently in 8:4 Colorado? 8:5 A. Uh-huh. 8:6 Q. What city in Colorado do you live in? 8:7 A. Aspen.</p>	LH-618.0
8:17 - 9:6	<p>Lamb, Hana 09-29-2020 (00:00:35)</p> <p>8:17 Q. Where did you grow up? 8:18 A. I grew up in Sebastopol, California. 8:19 Q. And do you have a college degree? 8:20 A. Yes. 8:21 Q. Where is that from? 8:22 A. The University of Oregon. 8:23 Q. And what year did you receive that degree? 8:24 A. 2016. 8:25 Q. What degree did you get? 9:1 A. I got a bachelor's in human physiology, and I 9:2 also got a bachelor's in psychology. 9:3 Q. Do you have any further education beyond the 9:4 degree from the University of Oregon in 2016? 9:5 A. Yes. I am working toward my master's at USC 9:6 for education, and I will graduate in May of 2021.</p>	LH-618.0
9:11 - 11:21	<p>Lamb, Hana 09-29-2020 (00:02:38)</p> <p>9:11 Q. Oh, sorry. When you graduated from the 9:12 University of Oregon, what was the first job that you 9:13 held?</p>	LH-618.0

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9:14 A. I was a medical assistant for a podiatry
 9:15 clinic.
 9:16 Q. And where was that located?
 9:17 A. San Francisco, California.
 9:18 Q. What was the name of the clinic?
 9:19 A. Financial District Foot & Ankle Center.
 9:20 Q. How long did you work there for?
 9:21 A. A year.
 9:22 Q. And that would have taken you to about 2017, is
 9:23 that right, or 2018?
 9:24 A. The end of 2017, beginning of 2018.
 9:25 Q. What job did you take after leaving the
 10:1 podiatrist?
 10:2 A. PFC.
 10:3 Q. And do you recall when you started there?
 10:4 A. In -- sometime in February of 2018.
 10:5 Q. Was there a period of time where you weren't
 10:6 working between the job for the podiatrist and starting
 10:7 at PFC?
 10:8 A. No. I've always been a waitress. So I just
 10:9 would pick up more shifts.
 10:10 Q. Okay. I guess my question was a little
 10:11 different though. When you left the podiatrist, did you
 10:12 start immediately at PFC as an employee or did you have
 10:13 a gap?
 10:14 A. I had a little gap.
 10:15 Q. How long was that gap?
 10:16 A. I don't -- I don't know. Not long.
 10:17 Q. And then you would also make extra money by
 10:18 being a waitress?
 10:19 A. Yeah.
 10:20 Q. Do you have any certifications in addition to
 10:21 your education?
 10:22 A. Lifeguard certification. I was a lifeguard.
 10:23 CPR. But that's all for -- and then stuff for teaching.
 10:24 Q. Oh, okay. And any certifications for working
 10:25 in an IVF lab?
 11:1 A. No.
 11:2 Q. What was your title when you were hired by PFC?
 11:3 A. Laboratory assistant.

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11:4 Q. And what were the job duties of a laboratory

11:5 assistant in February of 2018?

11:6 A. I don't remember. Many different things.

11:7 Q. Like what?

11:8 A. I put in data for them.

11:9 Q. And what kind of data would you put in?

11:10 A. Data from, like, the day's work.

11:11 Q. And specifically what kind of data?

11:12 A. How the embryos were developing.

11:13 Q. Okay. Any other data?

11:14 A. I don't remember.

11:15 Q. Okay.

11:16 A. Specifics.

11:17 Q. And did your title -- did your title ever

11:18 change at PFC?

11:19 A. No.

11:20 Q. It was always laboratory assistant?

11:21 A. Yep.

13:22 - 14:4

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13:22 Q. All right. Have you ever been in a lawsuit as

13:23 a party or a witness before?

13:24 A. No.

13:25 Q. Have you ever given testimony before?

14:1 A. No.

14:2 Q. Not in a deposition or at a trial?

14:3 A. No.

14:4 Q. I'm going to show you a document. And it's

14:16 - 17:14

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14:16 Q. Oh, okay. Has everyone else been able to

14:17 download the document?

14:18 A. Oh, yeah. I forgot about these. That's funny.

14:19 Q. Okay. So you've been able to download the

14:20 document that I've given to you?

14:21 A. Yeah.

14:22 MR. DUFFY: I've gone ahead and marked this as

14:23 Chart Exhibit No. 216. It's the PFC handwritten lab

14:24 schedules from February and March of 2018.

14:25 //

15:1 (Defendant's Exhibit 216 marked for

15:2 identification.)

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15:3 Q. BY MR. DUFFY: Ms. Lamb, would you turn to page
15:4 3 of Exhibit 216?

15:5 A. Yeah.

15:6 Q. Does this appear to be the handwritten lab
15:7 schedules for PFC in February of 2018?

15:8 A. Yeah.

15:9 MR. TARANTINO: Objection. Lacks foundation.

15:10 Q. BY MR. DUFFY: Are you familiar with these kind
15:11 of documents?

15:12 A. Yeah.

15:13 Q. So it was your memory that you started sometime
15:14 in February of 2018; is that right?

15:15 A. Yeah. It looks like February 12th.

15:16 Q. Okay. That's what I was going to ask you. So
15:17 you knew where I was going. So on February 12 there's a
15:18 handwritten note here on page 3 of Exhibit 216, and it
15:19 says lab assistant Hannah Lamb; is that right?

15:20 A. My name is Hana.

15:21 Q. Hana. I'm sorry.

15:22 A. It's okay.

15:23 Q. And it says lab assistant Hana Lamb; is that
15:24 right?

15:25 A. Yeah, uh-huh.

16:1 Q. And there's a list of people who are scheduled
16:2 to work for the first 16 days of February there on the
16:3 left. Do you see that?

16:4 A. Yes.

16:5 Q. And your name is not there; correct?

16:6 A. Yes.

16:7 Q. I'm correct that your name is not there?

16:8 A. Yeah. I don't see my name on the left.

16:9 Q. All right. Now if you'd go to the fourth page
16:10 of Exhibit 216 and let me know when you're there.

16:11 A. Okay. I'm there.

16:12 Q. On the fourth page of Exhibit 216 we have the
16:13 PFC handwritten lab schedule for February 17 through
16:14 February 28 of 2018; is that right?

16:15 A. Yes.

16:16 Q. And in the names on the left column, do you see
16:17 your name?

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16:18 A. No.

16:19 Q. And if you look specifically for February 23rd,
16:20 there's no indication on the handwritten lab schedules
16:21 that you were scheduled to work that day; correct?

16:22 A. No. Or correct. You're correct. Sorry. You
16:23 are.

16:24 Q. That's all right. Let me ask that again. I
16:25 know this is a very unusual process. It really is. So
17:1 let me just ask that question again. Okay?

17:2 So on February 23 there's no indication here
17:3 that -- in Exhibit 216 that you were scheduled to work
17:4 on February 23; correct?

17:5 A. Yes.

17:6 Q. Okay. Now I'm going to show you through this
17:7 chat feature another document. Let me know when you've
17:8 had an opportunity to download it.

17:9 A. I got it.

17:10 MR. DUFFY: All right. Exhibit 27 -- or
17:11 Exhibit 217 are -- for identification is the Pacific
17:12 Fertility electronic lab schedules for December 2017,
17:13 January 2018, and February 2018. But I've been told
17:14 that the February 2018 schedule was misdated 2017.

18:6 - 19:11

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18:6 Have you come to learn in any way that this document has
18:7 been misdated?

18:8 MR. TARANTINO: Objection. Assumes facts. Go
18:9 ahead.

18:10 Q. BY MR. DUFFY: I couldn't hear you, Ms. Lamb.

18:11 A. Just now? Besides just now?

18:12 Q. I guess did you learn from me?

18:13 A. Yes.

18:14 Q. All right. So again when we were looking at
18:15 the handwritten schedules for February 2018, your start
18:16 date was February 12. Do you remember that?

18:17 A. Uh-huh.

18:18 Q. Okay. And so here on Exhibit 217 we go to
18:19 February 12 and there's a note there. Do you see that?

18:20 A. Yes.

18:21 Q. It says "Welcome Hana!"; right? So that's the
18:22 same start date here in this electronic version schedule

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18:23 as in the handwritten; correct?

18:24 A. Yes.

18:25 Q. Now let's turn to February 23. And in this

19:1 version of the lab schedule you are not scheduled to

19:2 work on February 23; correct?

19:3 A. Yeah.

19:4 Q. And the late person designated on February 23

19:5 is Anya. Do you see that?

19:6 A. Yes.

19:7 Q. And when a late person is scheduled to be the

19:8 late person, do they do the quality control measurements

19:9 for the freezers?

19:10 MR. TARANTINO: Objection. Lacks foundation.

19:11 THE WITNESS: No, not necessarily.

19:23 - 28:5

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19:23 MR. DUFFY: All right. So exhibit -- Chart

19:24 Exhibit No. 211 are the Tank 4 data entries produced by

19:25 Pacific MSO.

20:1 (Defendant's Exhibit 211 marked for

20:2 identification.)

20:3 Q. BY MR. DUFFY: And I'd like you to turn to page

20:4 3, if you could.

20:5 A. Okay.

20:6 Q. And there's an entry there for February 23,

20:7 2018. Do you see that?

20:8 A. Yes.

20:9 Q. And that has an entry of 14. Do you see that?

20:10 A. Yes.

20:11 Q. And it has a person who is associated with that

20:12 measurement. Do you see that?

20:13 A. Yep.

20:14 Q. And what name is there?

20:15 A. Hana Lamb.

20:16 Q. And that's you?

20:17 A. Yeah.

20:18 Q. All right. And there's a date that is put

20:19 right to the right of your name. Do you see that?

20:20 A. Yes.

20:21 Q. And it says February 23, 2018; is that right?

20:22 A. Yep.

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20:23 Q. Did you make that measurement?
 20:24 A. I guess so.
 20:25 Q. Well, when you say you guess so --
 21:1 A. I don't remember specifically.
 21:2 Q. All right. Well, let me just go back and just
 21:3 ask you a couple more questions. We've gone through the
 21:4 records showing that you weren't scheduled to work on
 21:5 February 23; correct?
 21:6 A. Yes.
 21:7 MR. TARANTINO: Objection. Mischaracterizes
 21:8 evidence.
 21:9 Q. BY MR. DUFFY: And your name is associated with
 21:10 a measurement on February 23; is that right?
 21:11 A. Yes.
 21:12 Q. And you said you guess you made that
 21:13 measurement. Do you recall that?
 21:14 A. Yes.
 21:15 Q. What makes you say that?
 21:16 A. Because my name is on the log.
 21:17 Q. And do you have a personal memory of making
 21:18 that measurement on February 23?
 21:19 A. No.
 21:20 Q. What would you need to do to refresh your
 21:21 memory to see whether you were the person who made the
 21:22 measurement?
 21:23 A. Go back in time two years.
 21:24 Q. Anything else, Ms. Lamb?
 21:25 A. No. I mean, it says my name. So....
 22:1 Q. Okay. Were you aware that -- well, let me lay
 22:2 a little foundation. So there was an electronic
 22:3 software for measuring liquid nitrogen levels in the
 22:4 tanks known as Reflections. Do you recall that?
 22:5 A. Yes.
 22:6 MR. TARANTINO: Objection. Mischaracterizes
 22:7 the evidence.
 22:8 MR. DUFFY: Cherree, did you get the answer?
 22:9 Sorry?
 22:10 THE REPORTER: I got the "Yes."
 22:11 Q. BY MR. DUFFY: And were you trained in how to
 22:12 use the software?

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22:13 A. Yes.
 22:14 Q. Who trained you?
 22:15 A. Gina.
 22:16 Q. Gina Cirimele?
 22:17 A. Yeah.
 22:18 Q. And were you authorized to make measurements
 22:19 and record them in Reflections?
 22:20 A. Yes.
 22:21 Q. Were you familiar with the program's ability to
 22:22 have one person enter a measurement and then have the
 22:23 name changed to a different person?
 22:24 MR. TARANTINO: Objection. Assumes facts.
 22:25 Mischaracterizes evidence.
 23:1 THE WITNESS: I don't -- I don't know.
 23:2 Q. BY MR. DUFFY: Was there a drop-down menu that
 23:3 would allow someone to assign a measurement to a
 23:4 different person? Do you recall that?
 23:5 A. It would assign a measurement to a person.
 23:6 Q. To a person, correct. But you do you recall
 23:7 that feature?
 23:8 A. Yes.
 23:9 Q. So do you recall the ability for you to sign in
 23:10 in Reflections and then use that drop-down menu and
 23:11 record a measurement, for example, for Anya?
 23:12 A. Yes.
 23:13 Q. Shortly after you started at PFC do you recall
 23:14 an incident with Tank 4 and Dr. Conaghan asking that it
 23:15 be unplugged?
 23:16 MR. TARANTINO: Objection. Assumes facts not
 23:17 in evidence. Mischaracterizes the evidence.
 23:18 Speculation.
 23:19 THE WITNESS: I'm not going to lie. I missed
 23:20 the question. Can you --
 23:21 MR. DUFFY: Sure. Sure.
 23:22 THE WITNESS: Sorry.
 23:23 MR. DUFFY: Cherree, would you just read it
 23:24 back.
 23:25 (Whereupon the record was read as requested.)
 24:1 MR. TARANTINO: Same objections.
 24:2 THE WITNESS: I don't recall.

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24:3 Q. BY MR. DUFFY: Do you recall being trained on a
24:4 different monitoring procedure for Tank 4 in the lab
24:5 shortly after --
24:6 MR. TARANTINO: Objection. Sorry.
24:7 THE WITNESS: Yeah.
24:8 Q. BY MR. DUFFY: Okay. Tell me what you recall
24:9 about the change in the monitoring procedure for Tank 4.
24:10 A. I just -- the controller was broken. So they
24:11 would turn it off.
24:12 Q. By turning it off, do you mean unplugging it?
24:13 A. Yes. The controller.
24:14 Q. And what were you trained in in terms of how to
24:15 deal with that situation?
24:16 MR. TARANTINO: Objection. Vague.
24:17 THE WITNESS: I don't know. I wasn't really
24:18 trained.
24:19 Q. BY MR. DUFFY: You weren't trained in how to
24:20 deal with Tank 4 and how to monitor it?
24:21 MR. TARANTINO: Objection. Vague.
24:22 Mischaracterizes testimony.
24:23 THE WITNESS: Not that I recall.
24:24 Q. BY MR. DUFFY: Okay. Do you recall any --
24:25 well, strike that.
25:1 What was the procedure that was in place for
25:2 all tanks other than Tank 4 when you were doing
25:3 measurements of liquid nitrogen levels?
25:4 A. We'd go around and take the measurements. And
25:5 then the dewars we would dipstick with the measurement.
25:6 Q. Okay. So if you had a tank you would just look
25:7 at the display and get the measurement there; correct?
25:8 A. Yes.
25:9 Q. And if it was a dewar you would open the top
25:10 and then use a dipstick and measure the liquid nitrogen
25:11 manually; correct?
25:12 A. Yes.
25:13 Q. Tank 4 had a computer controller; correct?
25:14 A. Yes.
25:15 Q. And when it was unplugged, what was the
25:16 procedure you were given for how to measure liquid
25:17 nitrogen levels in Tank 4?

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25:18 A. I don't specifically recall.
 25:19 Q. Do you recall it being a different procedure
 25:20 that you had to do something different other than look
 25:21 at the level reading on the controller?
 25:22 A. I don't remember.
 25:23 Q. Were you there on March 4, 2018, when Dr.
 25:24 Conaghan had discovered that there was water on the
 25:25 floor and there was a problem with Tank 4?
 26:1 A. No. No.
 26:2 Q. On February 23rd did you fill the freezer with
 26:3 liquid nitrogen?
 26:4 MR. TARANTINO: Objection. Vague.
 26:5 THE WITNESS: What do you mean "freezer"?
 26:6 Q. BY MR. DUFFY: Excuse me. I'll miss -- let me
 26:7 restate the question. On February 23rd of 2018 did you
 26:8 fill Tank 4 with liquid nitrogen?
 26:9 A. I don't remember.
 26:10 Q. On February 23rd of 2018 did you use a dipstick
 26:11 to manually measure the liquid nitrogen in Tank 4?
 26:12 A. I don't remember.
 26:13 Q. On February 23rd did you plug in the freezer
 26:14 and hit a fill cycle?
 26:15 MR. TARANTINO: Objection. Vague.
 26:16 THE WITNESS: You mean the tank?
 26:17 Q. BY MR. DUFFY: Yeah.
 26:18 A. Okay. I don't remember.
 26:19 Q. Do you recall on February 23rd hearing an
 26:20 audible alarm from Tank 4?
 26:21 A. Oh that -- no, I don't remember.
 26:22 Q. Do you recall what the display read on February
 26:23 23rd, 2018?
 26:24 A. No.
 26:25 MR. TARANTINO: Objection. Vague.
 27:1 Q. BY MR. DUFFY: Were you on the call list for
 27:2 alarms?
 27:3 A. No.
 27:4 Q. And specifically you were not on the call list
 27:5 for alarms associated with Tank 4?
 27:6 A. Yes. I was not on the call list.
 27:7 Q. Did you enter the measurement on February 23,

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27:8 2018, in Reflections for Tank 4?

27:9 MR. TARANTINO: Objection. Asked and answered.

27:10 THE WITNESS: I -- yeah, like I said before, I

27:11 guess so.

27:12 Q. BY MR. DUFFY: Did you ever change that

27:13 measurement?

27:14 MR. TARANTINO: Objection. Asked and answered.

27:15 Lacks foundation. Badgering.

27:16 THE WITNESS: No.

27:17 Q. BY MR. DUFFY: I'm sorry?

27:18 A. No. No.

27:19 Q. On February 23rd, 2018, did you calculate the

27:20 LN2 consumption from Tank 4 that day?

27:21 MR. TARANTINO: Objection. Vague.

27:22 THE WITNESS: Is my name there? If my name is

27:23 there, then maybe.

27:24 Q. BY MR. DUFFY: Just from your personal memory,

27:25 ma'am.

28:1 A. No, I don't remember.

28:2 Q. Do you have a recollection on February 23,

28:3 2018, in calculating the fill time associated with the

28:4 fill on February 23, 2018, for Tank 4?

28:5 A. No.

28:15 - 35:7 **Lamb, Hana 09-29-2020 (00:07:38)**

28:15 Q. Do you know why you were asked to do LN2

28:16 measurements of tanks?

28:17 A. Because it was my job.

28:18 MR. TARANTINO: Objection. Lacks foundation.

28:19 Calls for speculation.

28:20 Q. BY MR. DUFFY: Do you know why -- did you know

28:21 why they asked you to do that as apart of your job?

28:22 MR. TARANTINO: Same objections.

28:23 THE WITNESS: To make sure that the levels were

28:24 high, filled.

28:25 Q. BY MR. DUFFY: Were you told anything else

29:1 about why you needed to measure LN2?

29:2 A. Not that I can recall.

29:3 Q. What were you told about the reasons you had to

29:4 use the Reflections software?

29:5 A. I don't -- to measure QC.

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29:6 Q. And what's that?

29:7 A. Quality control.

29:8 Q. And why did you have to measure QC?

29:9 A. To make sure that everything was functioning

29:10 normal every day and every evening.

29:11 Q. Were you familiar with the possibility of a

29:12 tank losing vacuum seal?

29:13 A. Not at that --

29:14 MR. TARANTINO: Objection. Calls for spec --

29:15 calls for speculation.

29:16 Q. BY MR. DUFFY: Not in -- not in February and

29:17 March of 2018; is that right?

29:18 A. No. Not until --

29:19 MR. TARANTINO: Same objections.

29:20 THE WITNESS: -- after. Same objections.

29:21 Q. BY MR. DUFFY: All right. So let me just make

29:22 sure we get this clear, Ms. Lamb, because we're in this

29:23 remote virtual world.

29:24 So in February and March of 2018 you did not

29:25 know about vacuum seal potentially being lost on tanks

30:1 in the IVF lab; is that right?

30:2 A. Yes.

30:3 MR. TARANTINO: Objection. Calls for

30:4 speculation. Lacks foundation. If you could just give

30:5 me a split second to object, that would be great.

30:6 Thanks.

30:7 THE REPORTER: Was the answer yes?

30:8 THE WITNESS: Yeah. I didn't know that that

30:9 was a thing before.

30:10 Q. BY MR. DUFFY: I'm sorry. You did or did not

30:11 know?

30:12 A. I did not know that that happened.

30:13 Q. Do you know why people looked at Reflections

30:14 information?

30:15 MR. TARANTINO: Objection. Lacks foundation.

30:16 THE WITNESS: What do you mean? Like, lawyers

30:17 or our people?

30:18 Q. BY MR. DUFFY: Lab. Lab people.

30:19 A. Why they looked at it?

30:20 Q. Yeah.

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30:21 A. I -- no. Ask Joe, I guess.

30:22 Q. But you don't know why people look at it? Is

30:23 that fair?

30:24 A. I --

30:25 MR. TARANTINO: Same objection.

31:1 THE WITNESS: I mean, the same reason I said

31:2 for quality control.

31:3 Q. BY MR. DUFFY: And beyond that do you have any

31:4 other understanding as to why lab personnel would be

31:5 looking in Reflections?

31:6 MR. TARANTINO: Objection. Lacks foundation.

31:7 THE WITNESS: Not really.

31:8 Q. BY MR. DUFFY: When you say "not really," is

31:9 there a part of it maybe that you might know something

31:10 about?

31:11 A. No. I mean --

31:12 MR. TARANTINO: Same objection.

31:13 THE WITNESS: -- it's not my -- I'm sorry.

31:14 MR. TARANTINO: Same objection.

31:15 Q. BY MR. DUFFY: You can answer.

31:16 A. There's a little lag, I think. Yeah, I mean,

31:17 that's not my area of expertise. So....

31:18 Q. BY MR. DUFFY: Okay. Who would look at the

31:19 Reflections data?

31:20 MR. TARANTINO: Objection. Lacks foundation.

31:21 THE WITNESS: Joe.

31:22 Q. BY MR. DUFFY: Anyone else?

31:23 MR. TARANTINO: Same objection.

31:24 THE WITNESS: Probably Erin.

31:25 Q. BY MR. DUFFY: Anyone else?

32:1 MR. TARANTINO: Same objection.

32:2 THE WITNESS: I don't know.

32:3 Q. BY MR. DUFFY: After the incident did you come

32:4 to learn that the inspector for the College of American

32:5 Pathologists was going to be coming to the Pacific

32:6 Fertility lab?

32:7 A. Yes.

32:8 MR. TARANTINO: Objection. Assumes facts.

32:9 Q. BY MR. DUFFY: And how did you come to learn

32:10 that?

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32:11 A. Joe told us.
 32:12 Q. Do you recall lab personnel preparing for that
 32:13 CAP inspection in March of 2018?
 32:14 A. Yes.
 32:15 Q. What do you recall about it?
 32:16 A. We did a lot of preparation.
 32:17 Q. When you say you "did a lot of preparation,"
 32:18 what do you mean?
 32:19 A. We cleaned and organized. And just that.
 32:20 Q. Anything else?
 32:21 A. That was mostly what I remember.
 32:22 Q. Okay. Can you recall anything else other than
 32:23 cleaning and organizing?
 32:24 A. No. We did a lot of -- lot of organizing,
 32:25 cleaning.
 33:1 Q. Okay. And during the time that you were
 33:2 preparing for the inspection, did you come to learn that
 33:3 there were missing measurements of LN2 levels for Tank 4
 33:4 in Reflections?
 33:5 MR. TARANTINO: Objection. Mischaracterizes
 33:6 evidence. Assumes facts not in evidence. Lacks
 33:7 foundation.
 33:8 THE WITNESS: I don't remember.
 33:9 Q. BY MR. DUFFY: Did you ever have a conversation
 33:10 with Joe Conaghan about possibly five to ten missing LN2
 33:11 measurements in Reflections?
 33:12 MR. TARANTINO: Objection. Mischaracterizes
 33:13 testimony. Speculation. Asked and answered.
 33:14 THE WITNESS: I don't -- I don't remember.
 33:15 Q. BY MR. DUFFY: Did you ever speak with Gina
 33:16 Cirimele about possibly five to ten missing LN2
 33:17 measurements in Reflections?
 33:18 MR. TARANTINO: Objection. Assumes facts.
 33:19 Speculation. Lacks foundation.
 33:20 THE WITNESS: I don't remember.
 33:21 Q. BY MR. DUFFY: Do you remember any
 33:22 conversations with any lab personnel about missing LN2
 33:23 measurements prior to the CAP inspection?
 33:24 MR. TARANTINO: Objection. Assumes facts.
 33:25 THE WITNESS: Not -- no.

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34:1 Q. BY MR. DUFFY: Do you have any general
 34:2 recollection whatsoever of missing LN2 measurements in
 34:3 Reflections prior to the CAP inspection?
 34:4 MR. TARANTINO: Objection. Vague. Lacks
 34:5 foundation.
 34:6 THE WITNESS: Generally, I do remember that
 34:7 they were maybe talking about that in the lab.
 34:8 Q. BY MR. DUFFY: And was this in the context of
 34:9 getting ready for the CAP inspection?
 34:10 A. Yeah. Well, we had -- we had a few CAP
 34:11 inspections. So I don't remember which one.
 34:12 Q. Okay. Do you -- what do you recall about the
 34:13 discussions about missing LN2 measurements?
 34:14 A. Just that they were. It wasn't a good thing.
 34:15 And, I mean, we put in places so it would never happen
 34:16 again.
 34:17 Q. Okay. What was the -- what was the negative
 34:18 connotation of not having LN2 measurements? What do you
 34:19 recall about that?
 34:20 MR. TARANTINO: Objection. Lacks foundation.
 34:21 Speculation.
 34:22 THE WITNESS: I don't remember.
 34:23 Q. BY MR. DUFFY: When you said it was not a good
 34:24 thing, what did you mean?
 34:25 A. I mean, it's not good missing anything, any
 35:1 data; right?
 35:2 Q. Yeah. Why is it not a good thing to have
 35:3 missing data?
 35:4 MR. TARANTINO: Objection. Asked and answered.
 35:5 THE WITNESS: Because it could, you know, skew
 35:6 your results or, you know, you don't know what's
 35:7 happening that day if you don't have data.

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35:18 Did someone from the lab, and I'm talking about
 35:19 a lab person, come to you and ask you about LN2
 35:20 measurements that were missing?
 35:21 MR. TARANTINO: Objection. Assumes facts.
 35:22 Lacks foundation.
 35:23 THE WITNESS: I don't remember.
 35:24 Q. BY MR. DUFFY: Do you recall anyone from the

35:18 - 38:20

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35:25 lab asking you about the February 23 measurement from
36:1 2018?

36:2 MR. TARANTINO: Objection. Assumes facts.

36:3 Foundation. Asked and answered.

36:4 THE WITNESS: No.

36:5 Q. BY MR. DUFFY: Do you recall anyone coming to
36:6 you about any missing measurement for February 23, 2018?

36:7 MR. TARANTINO: Objection. Lacks foundation.

36:8 Assumes facts. Asked and answered.

36:9 THE WITNESS: No.

36:10 Q. BY MR. DUFFY: Do you recall anyone coming to
36:11 speak with you about dates where they thought you may

36:12 have measured, but it didn't make its way into

36:13 Reflections?

36:14 A. No.

36:15 MR. TARANTINO: Objection. Mischaracterizes
36:16 evidence.

36:17 THE WITNESS: No.

36:18 Q. BY MR. DUFFY: Were any of the missing
36:19 measurements for Tank 4 on days where you were supposed
36:20 to measure it?

36:21 MR. TARANTINO: Objection. Lacks foundation.

36:22 Calls for speculation. Assumes facts not in evidence.

36:23 Mischaracterizes the evidence.

36:24 THE WITNESS: I don't know.

36:25 Q. BY MR. DUFFY: Do you recall who had first told
37:1 you that there were missing LN2 measurements for Tank 4
37:2 prior to the CAP inspection?

37:3 MR. TARANTINO: Objection. Mischaracterizes
37:4 evidence. Speculation.

37:5 THE WITNESS: I don't know.

37:6 Q. BY MR. DUFFY: Do you recall anyone from the
37:7 lab checking the work schedules for the dates where
37:8 there were missing LN2 measurements for Tank 4?

37:9 MR. TARANTINO: Objection. Assumes facts.
37:10 Foundation.

37:11 THE WITNESS: Yeah, I don't know.

37:12 Q. BY MR. DUFFY: Did you check the work schedule
37:13 to see whether you were working on any of the days where
37:14 LN2 measurements were missing for Tank 4?

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37:15 MR. TARANTINO: Objection. Assumes facts.
 37:16 Mischaracterizes evidence. Lacks foundation.
 37:17 THE WITNESS: I don't -- no. I don't even know
 37:18 what the dates are.
 37:19 Q. BY MR. DUFFY: Who did you have conversations
 37:20 with about the missing measurements?
 37:21 MR. TARANTINO: Objection. Assumes facts.
 37:22 Mischaracterizes testimony.
 37:23 THE WITNESS: I have no clue.
 37:24 Q. BY MR. DUFFY: Okay. Are you familiar with the
 37:25 probes that can go inside a dewar and a tank that are
 38:1 connected to the Sensaphone?
 38:2 A. Yes.
 38:3 Q. Those were not used for Tank 4 prior to the
 38:4 incident; correct?
 38:5 MR. TARANTINO: Objection. Lacks foundation.
 38:6 Vague.
 38:7 THE WITNESS: I don't remember.
 38:8 Q. BY MR. DUFFY: After the Tank 4 incident, did
 38:9 the lab use probes for dewars?
 38:10 MR. TARANTINO: Objection. Vague.
 38:11 THE WITNESS: Yes.
 38:12 Q. BY MR. DUFFY: And did they also use probes for
 38:13 tanks?
 38:14 MR. TARANTINO: Objection. Vague.
 38:15 THE WITNESS: Yes.
 38:16 MR. TARANTINO: Lacks --
 38:17 Q. BY MR. DUFFY: Do you have a memory prior to
 38:18 March 4 of 2018 that a probe was used for Tank 4?
 38:19 MR. TARANTINO: Objection. Vague.
 38:20 THE WITNESS: No. I don't remember.

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39:4 Q. BY MR. DUFFY: Did you ever read the owner's
 39:5 manual for Tank 4?
 39:6 A. No.
 39:7 Q. Do you know who in the lab would be the person
 39:8 who would be reviewing the owner's manual for Tank 4?
 39:9 MR. TARANTINO: Objection. Calls for
 39:10 speculation. Lacks foundation.
 39:11 THE WITNESS: Joe or Erin.

39:4 - 44:23

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39:12 Q. BY MR. DUFFY: Anyone else?
39:13 MR. TARANTINO: Same objections.
39:14 THE WITNESS: Huh-huh. No.
39:15 Q. BY MR. DUFFY: The measuring stick that we used
39:16 in the lab in March of 2018, was that -- well, strike
39:17 that.
39:18 Was there a measuring stick dedicated just to
39:19 Tank 4?
39:20 A. No.
39:21 Q. It could have been any of the measuring sticks
39:22 that were available in the lab that would be used to
39:23 measure LN2 levels?
39:24 A. Unless they were for infectious diseases. We
39:25 had specific ones for those.
40:1 Q. Oh. But if -- but for Tank 4 there wasn't a
40:2 specific dedicated dipstick; correct?
40:3 A. No, there wasn't.
40:4 Q. The LN2 supply for Tank 4 was in the tank room;
40:5 is that right?
40:6 A. Yes.
40:7 Q. And it was connected through some plumbing that
40:8 would go up into the ceiling and down into the lab. Do
40:9 you recall that?
40:10 A. Yes.
40:11 Q. In the lab in March of 2018 was there a manual
40:12 fill line that you could use to manually fill Tank 4?
40:13 A. Yes.
40:14 Q. And where was that located?
40:15 A. The fill line?
40:16 Q. Yeah.
40:17 A. In the ceilings.
40:18 Q. Was the -- was the fill line in the IVF lab
40:19 itself?
40:20 A. It would go from the tank room to the IVF lab.
40:21 So yes.
40:22 Q. And then but where in the IVF lab would the
40:23 fill line be in March of 2018?
40:24 A. It would be connected to all the tanks.
40:25 Q. Oh, I see. I guess I'm asking a little bit of
41:1 a different question, Ms. Lamb. I'm talking about a

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41:2 manual fill line, one that's not already connected to
 41:3 any of the tanks that you could then open the lid and
 41:4 fill through the top.
 41:5 Was there that kind of a plumbing apparatus
 41:6 that allowed you to do a manual fill in Tank 4 in March
 41:7 of 2018?
 41:8 A. Oh, no.
 41:9 Q. So if in March -- in February and March of 2018
 41:10 if you wanted to do a manual fill of Tank 4, you'd have
 41:11 to use a LN2 supply from the tank room; is that right?
 41:12 A. Yeah.
 41:13 Q. And you could wheel in the supply tank to fill
 41:14 it? Is that one way to do it?
 41:15 A. Yeah, that was one way to do it.
 41:16 Q. And another way to do it would be you could
 41:17 just fill a bucket; right?
 41:18 MR. TARANTINO: Objection. Lacks foundation.
 41:19 THE WITNESS: Yes.
 41:20 Q. BY MR. DUFFY: Any other ways to manual fill
 41:21 Tank 4 in February and March of 2018?
 41:22 MR. TARANTINO: Objection. Lacks foundation.
 41:23 Speculation.
 41:24 THE WITNESS: Not that I remember.
 41:25 Q. BY MR. DUFFY: Were lab assistants required to
 42:1 order LN2 supply for the lab?
 42:2 MR. TARANTINO: Objection. Lacks foundation.
 42:3 THE WITNESS: Yes.
 42:4 Q. BY MR. DUFFY: Was that one of your job duties?
 42:5 A. Yes.
 42:6 Q. And how would you go about ordering new LN2
 42:7 supply?
 42:8 A. I would call Praxair, who was our supplier, and
 42:9 -- well, we have -- we would have, like, a standing
 42:10 delivery. And I would tell them, you know, "I need four
 42:11 low pressures and two high pressures."
 42:12 Q. Was that the standing order?
 42:13 A. It --
 42:14 MR. TARANTINO: Objection. Lacks foundation.
 42:15 THE WITNESS: It would change.
 42:16 Q. BY MR. DUFFY: It would change. Was it your

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42:17 job, then, to calculate what the consumption of LN2 was
42:18 in the lab before you did your order?

42:19 A. Yes. But that was after the whole incident.

42:20 That all kind of started after the incident.

42:21 Q. So before the incident when you first started

42:22 in February and early March, did you calculate LN2

42:23 consumption?

42:24 MR. TARANTINO: Objection. Vague.

42:25 THE WITNESS: No.

43:1 Q. BY MR. DUFFY: How would you determine how much

43:2 LN2 was needed by the lab?

43:3 MR. TARANTINO: Objection. Lacks foundation.

43:4 Vague.

43:5 Q. BY MR. DUFFY: During the February, March 2018

43:6 time frame.

43:7 MR. TARANTINO: Same objections.

43:8 THE WITNESS: They would -- I mean, if we were

43:9 low, you could tell.

43:10 Q. BY MR. DUFFY: Okay. So you're moving your

43:11 hand like you're shaking a supply --

43:12 A. Oh, you could shake it. Sorry.

43:13 Q. No. No. That's okay. And that way you could

43:14 gauge whether it was full or empty; right?

43:15 A. Yeah.

43:16 Q. In February of 2018 when you started at PFC,

43:17 were you trained in how to take a supply can and shake

43:18 it to determine how much was in it?

43:19 MR. TARANTINO: Objection. Assumes facts.

43:20 THE WITNESS: Yes.

43:21 Q. BY MR. DUFFY: Who taught you how to do that?

43:22 A. Anya.

43:23 Q. And can you tell me what you remember about

43:24 that training?

43:25 A. I don't -- I -- remember much, just that she

44:1 showed me where the tanks were, what they looked like,

44:2 how to move them.

44:3 Q. And then how to tip them and shake them to see

44:4 if they're getting close to being empty?

44:5 A. Yeah. You would not --

44:6 MR. TARANTINO: Objection. Assume -- lacks

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44:7 foundation. Assumes facts.

44:8 THE WITNESS: I would not tip them. But, yeah,

44:9 you can -- how you can tell.

44:10 Q. BY MR. DUFFY: Okay. All right. I'm taller.

44:11 So when I get -- tip them. How tall are you, if don't

44:12 mind my asking?

44:13 A. I'm 5-9.

44:14 Q. Okay. All right. So were you tall enough to

44:15 be able to tip them or no?

44:16 A. I would not tip them.

44:17 Q. You would not. Okay. All right. So you would

44:18 just shake them and determine the level inside the can;

44:19 right?

44:20 A. Yeah. You can move it and feel it.

44:21 Q. Okay. And then do you remember the dials that

44:22 were on top of those supply cans?

44:23 A. Yeah.

45:5 - 51:25

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45:5 Q. BY MR. DUFFY: So there's a -- one of the dials

45:6 that's on those supply cans, does it have a full or

45:7 empty gauge on it?

45:8 A. Yes.

45:9 Q. And sometimes did those not work?

45:10 MR. TARANTINO: Objection. Lacks foundation.

45:11 Vague. Speculation.

45:12 THE WITNESS: Yes.

45:13 Q. BY MR. DUFFY: And is that why, then, you had

45:14 to figure out yourself manually by shaking the supply

45:15 can how much was still in it?

45:16 A. Yes.

45:17 Q. Other than just shaking it in February and

45:18 March of 2018, were you -- were you taught anything else

45:19 to determine how much liquid nitrogen should be ordered?

45:20 MR. TARANTINO: Objection. Lacks foundation.

45:21 Assumes facts.

45:22 THE WITNESS: Yeah. If you -- if you turn it

45:23 on and nothing comes out, that also tells you that

45:24 there's nothing in there.

45:25 Q. BY MR. DUFFY: Okay. When you say "turn it on

46:1 and nothing comes out," where would it be coming out

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46:2 that you could visually see that?

46:3 A. Through a hose.

46:4 MR. TARANTINO: Objection. Mischaracterizes

46:5 testimony.

46:6 THE WITNESS: Through the hose.

46:7 Q. BY MR. DUFFY: Oh, the manual fill hose?

46:8 A. Uh-huh.

46:9 Q. Is that a yes?

46:10 A. Yes. Sorry.

46:11 Q. No, that's all right. And have you had

46:12 occasions when you came to the tank room and tested the

46:13 supply can and initiated a manual fill into a bucket

46:14 where nothing came out?

46:15 A. Yes.

46:16 Q. Did that happen in February of 2018, to your

46:17 memory?

46:18 A. I don't -- I don't know.

46:19 Q. How about in March of 2018, did you ever go

46:20 into the tank room and initiate a manual fill into a

46:21 bucket and nothing came out of the supply can?

46:22 A. I don't remember. I don't remember any

46:23 specifics. I know it happened, but I couldn't tell you

46:24 when.

46:25 Q. In those instances where you tried -- where you

47:1 initiated a fill manually into a bucket and nothing came

47:2 out, was that supply can connected to the plumbing

47:3 system feeding into the IVF lab?

47:4 MR. TARANTINO: Objection. Lacks foundation.

47:5 Calls for speculation. Assumes facts.

47:6 THE WITNESS: No. They're different systems.

47:7 Q. BY MR. DUFFY: Okay. So the supply tank that

47:8 you would test for the level by initiating a manual fill

47:9 into a bucket was not a fill tank connected to the

47:10 plumbing system?

47:11 MR. TARANTINO: Objection. Mischaracterizes

47:12 testimony. Lacks foundation.

47:13 THE WITNESS: So we had tanks for the plumbing

47:14 system, as you call it, and then we had our manual fill

47:15 tank.

47:16 Q. BY MR. DUFFY: Okay. I see. Had you ever

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47:17 checked the level of a LN2 supply tank that was
 47:18 connected to the plumbing system for the tanks in the
 47:19 IVF lab and had that -- have no LN2 in it?
 47:20 MR. TARANTINO: Objection. Vague.
 47:21 Speculation.
 47:22 THE WITNESS: Yes.
 47:23 Q. BY MR. DUFFY: When did that happen?
 47:24 A. I don't know.
 47:25 Q. Was it a frequent occurrence?
 48:1 MR. TARANTINO: Objection. Vague.
 48:2 THE WITNESS: No.
 48:3 Q. BY MR. DUFFY: If you could provide me your
 48:4 best estimate the number of times where you tested a
 48:5 level of LN2 in a supply can connected to the plumbing
 48:6 and discovered that there was no LN2 in the supply can?
 48:7 MR. TARANTINO: Objection. Vague.
 48:8 Speculation.
 48:9 THE WITNESS: Maybe, like, four or five times.
 48:10 And also they were all after the Tank 4 incident.
 48:11 Q. BY MR. DUFFY: Okay. So it's your memory,
 48:12 then, that these incidents where there was no supply of
 48:13 liquid nitrogen in those supply tanks feeding into the
 48:14 plumbing system for the IVF lab all took place after the
 48:15 March 4 incident?
 48:16 MR. TARANTINO: Objection. Mischaracterizes
 48:17 testimony. Vague.
 48:18 THE WITNESS: Yeah. I'm not sure, but yeah.
 48:19 Q. BY MR. DUFFY: Is it -- is it possible that in
 48:20 some of those instances where the supply cans supplying
 48:21 the tanks in the IVF lab went dry occurred before the
 48:22 incident?
 48:23 MR. TARANTINO: Objection. Objection. Asked
 48:24 and answered. Mischaracterizes testimony.
 48:25 THE WITNESS: Maybe. I don't remember.
 49:1 Q. BY MR. DUFFY: In those situations where you
 49:2 observed that a supply tank supplying the tanks in the
 49:3 IVF lab had gone dry, what did you do about that?
 49:4 MR. TARANTINO: Objection. Mischaracterizes
 49:5 testimony. Lacks foundation. Speculation. Assumes
 49:6 facts.

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49:7 THE WITNESS: We'd switch out the empty with
49:8 the full.

49:9 Q. BY MR. DUFFY: Okay. And that would allow,
49:10 then, a supply to feed the tanks in the IVF lab; is that
49:11 right?

49:12 MR. TARANTINO: Objection. Lacks foundation.
49:13 Speculation.

49:14 THE WITNESS: Yes.

49:15 Q. BY MR. DUFFY: And did you inform anyone in the
49:16 lab that one of the supply tanks supplying the tanks in
49:17 the IVF lab had gone dry?

49:18 MR. TARANTINO: Objection. Assumes facts.
49:19 Speculation.

49:20 THE WITNESS: Probably. I don't remember
49:21 specifically. Yeah.

49:22 Q. BY MR. DUFFY: Who would normally -- who would
49:23 normally be the person you would report that condition
49:24 to?

49:25 A. Joe or Erin.

50:1 MR. TARANTINO: Objection. Assumes facts.

50:2 THE WITNESS: Joe or Erin.

50:3 Q. BY MR. DUFFY: And in the instances where you
50:4 did report that, do you have a memory of just what they
50:5 did about it?

50:6 MR. TARANTINO: Objection. Mischaracterizes
50:7 testimony. Assumes facts.

50:8 THE WITNESS: No, I don't.

50:9 Q. BY MR. DUFFY: How do you determine which lab
50:10 personnel was assigned to manually measure Tank 4?

50:11 MR. TARANTINO: Objection. Lacks foundation.

50:12 THE WITNESS: Sorry. One more -- can you
50:13 repeat the question?

50:14 Q. BY MR. DUFFY: Sure. If you were going to try
50:15 and determine which lab personnel was assigned to
50:16 manually measure Tank 4 on a particular day, how would
50:17 you go about learning that?

50:18 MR. TARANTINO: Same objection.

50:19 THE WITNESS: I would look at the Reflections
50:20 log.

50:21 Q. BY MR. DUFFY: Okay. And if, as we discussed,

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50:22 some of those measurements were missing, what else would
 50:23 you do to determine the name of the lab person who was
 50:24 assigned to do the measurement on the day where there
 50:25 was no measurement in Reflections?

51:1 MR. TARANTINO: Objection. Mischaracterizes

51:2 testimony. Mischaracterizes documents. Assumes facts.

51:3 Speculation.

51:4 THE WITNESS: I don't know. Ask them.

51:5 Q. BY MR. DUFFY: Okay. Other than Reflections,

51:6 though, do you have any other document that you could

51:7 point me to to help me figure out who was supposed to

51:8 measure on the days when there was no measurement?

51:9 MR. TARANTINO: Objection. Assumes facts not

51:10 in evidence. Mischaracterizes testimony.

51:11 THE WITNESS: No -- we would write it down, but

51:12 that wasn't until after Tank 4. We started writing it

51:13 down and putting it in Reflections. But that --

51:14 Q. BY MR. DUFFY: That's after?

51:15 A. Yeah.

51:16 Q. Okay. How about before?

51:17 MR. TARANTINO: Objection. Vague.

51:18 THE WITNESS: I don't remember writing it then.

51:19 We'd just put it into Reflections.

51:20 Q. BY MR. DUFFY: So can you think of any other

51:21 document that might be out there that could help me

51:22 determine who was responsible for measuring Tank 4 on

51:23 the days when measurements might be missing?

51:24 MR. TARANTINO: Objection. Assumes facts.

51:25 THE WITNESS: No. Sorry.

54:13 - 55:23

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54:13 So this will be marked as Plaintiffs' Exhibit

54:14 372.

54:15 (Plaintiffs' Exhibit 372 marked for

54:16 identification.)

54:17 Q. BY MS. ZEMAN: Ms. Lamb, do you recognize the

54:18 contents of this photo?

54:19 A. Yeah. It looks like it's a tank inside of the

54:20 lab.

54:21 Q. Okay. So this is the lab space where Tank 4

54:22 was in March of 2018?

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54:23 A. Not the exact spot. But it's in the lab.
 54:24 Q. Okay. Where is this located in relation to
 54:25 where Tank 4 would have been on March 4th of 2018?
 55:1 A. It's, like, maybe 30 feet away on the other
 55:2 side of that wall.
 55:3 Q. Okay. And what is this tank?
 55:4 A. It's a -- it's a liquid nitrogen tank, like a
 55:5 filler -- manual filler tank like I was just talking
 55:6 about with John.
 55:7 Q. Okay. So could this -- is this a tank that
 55:8 contains liquid nitrogen that could be used to manually
 55:9 fill one of the tanks in the lab at PFC?
 55:10 A. It looks like it.
 55:11 Q. Okay. Do you know if this or a similar tank
 55:12 was located in the lab on March 4th of 2018?
 55:13 A. I don't know.
 55:14 Q. Was a tank like this contained in and located
 55:15 in the PFC lab when you started working at PFC?
 55:16 A. No.
 55:17 Q. Was a tank like this kept in the lab on a
 55:18 regular basis?
 55:19 A. No.
 55:20 Q. Do you know why this tank is there?
 55:21 MR. TARANTINO: Objection. Lacks foundation.
 55:22 THE WITNESS: Probably because after Tank 4 we
 55:23 started keeping a tank close by.

Defense Designations = 00:47:55

Total Time = 00:47:55